

PURPOSE

The Population Health Administration's (PHA) policy and procedure regarding the roles and responsibilities for assuring compliance and to ensure accurate tracking of aggregate data products that are not already publicly available.

DEFINITIONS

Aggregate Data Requests

An aggregate data request is a request for a set of de-identified data according to MDHHS policy; see all policies [Administrative Policy Legal \(APL\) 68D-032--Protected Health Information \(PHI\) De-identification Procedure](#). Aggregate data are defined as data not limited to one person, but summary data that are tracked across time, across organizations, counties, populations, or some other variable.

PROCEDURE

Data Steward:

- The data steward will be designated by the manager in each program area (unit or section) to provide oversight and management of data requests for all data used by that program area.
- The manager will notify the bureau director who the data steward will be in their respective program area.
- The data steward will be responsible for creating a logging system for requests and inquiries in accordance with the Population Health Administration policy on logging data requests. Data stewards will ensure that staff are appropriately trained on the logging system.
- The data steward will create data suppression guidelines for data for which they serve as the steward. Data suppression guides will be stored on a shared drive or other location for all staff to access.
- Bureau directors, or their designee, will ensure that all program staff who are managing data request fulfillments are appropriately trained on what constitutes an aggregate data product.

- Data stewards, or their manager, will review and approve or deny aggregate data products prior to their release to the data requestor.

Aggregate Data Requests Training:

- Bureau directors will be responsible for identifying the person(s) responsible for ensuring all staff managing data, those responsible for data requests, and end users are trained.
- All PHA staff will be trained annually on what is de-identified data, how it can be shared, and how it must be documented; see all policies [APL-68D-030--Protected Health Information \(PHI\) De-identification](#).
- Each bureau director, or designee, will be responsible for maintaining a training log and contact list.

Approval:

- All aggregate data requests will be approved or denied by the bureau director, designee, or the data steward before being released.
- The email of the approval will be saved as a PDF in a shared folder.

Logs

All data inquiries and requests for aggregate data sets must be logged; see PHA-124, Logging Data Requests.

**DATA
SUPPRESSION**

The data steward will be responsible for creating data suppression guidelines as related to the data for which they serve as the steward.

Data stewards will review aggregate data products prior to their release to ensure that the data product conforms to the relevant data suppression guidelines for the respective data in the aggregate data product.

In the event an exception to the aggregate data product suppression guidelines is needed for any aggregate data product, the data steward will supply a written rationale in support of that

exception, prior to the aggregated data product's release. This written rationale will be stored along with all other data product documentation on the appropriate shared network drive.

Note: No exception will be permitted if potentially personally identifiable data is created.

REFERENCES

[Administrative Policy Legal](#) (APL) Legal [68D0032, Protected Health Information \(PHI\) Deidentification Procedure](#).

[HPA-124, Logging Data Requests](#)

CONTACT

For more information regarding this policy contact MDHHS-PopHealth@michigan.gov.